## Case 1:19-cv-03079-AT Document 93 Filed 08/13/

STEVE S. EFRON ATTORNEY AT LAW

237 West 35th Street · Suite 150 New York, New York 10001 USDC SDNY

DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 8/13/2021

OF COUNSEL
RENEE L. CYR

August 11, 2021

Tel. (212) 867-1067 Fax. (212) 682-5958 SSEFRON@AOL.COM

Hon. Analisa Torres United States District Judge United States District Court Southern District of New York 500 Pearl Street New York NY 10007

Re: Moran v. MTA Metro-North Railroad Company et al. 19-cv-3079(AT)(KHP)

Dear Judge Torres:

This office represents MTA Metro-North R.R. and the individually named MTA police officers in this action seeking damages for an alleged violation of the Federal Employers' Liability Act and a deprivation of constitutional rights actionable under 42 U.S.C. § 1983.

I am writing to request an extension of two weeks, from August 17 to August 31, 2021, in which to submit the parties' joint pretrial order and related pretrial submissions, as set forth in the Court's Individual Practices. Counsel for plaintiff, Mr. George Cahill, has courteously consented to this request. The parties previously made a joint request for an extension of time to file the pretrial submissions, which the Court granted on April 12, 2021 (Doc. No. 89).

While I had set aside a substantial block of time to work on this matter, and have been doing so, submissions on dispositive motions in other cases have encroached on that time as a result of my consent to requested extensions of time, and due as well to a need to complete a number of depositions by a date certain. My co-counsel on this and other pending matters, Ms. Renee Cyr, recently underwent surgery on her hip and has not been able to attend to work at full capacity.

For these reasons, defendants respectfully request that their application for a two-week extension of time, from August 17 to August 31, 2021, be granted.

Respectfully yours,

/s/\_\_\_\_\_\_Steve S. Efron

SSE:s GRANTED. By **August 31, 2021**, the parties shall submit their proposed joint pretrial order and related pretrial submissions.

SO ORDERED.

Dated: August 13, 2021 New York, New York

> ANALISA TORRES United States District Judge